

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

CHARLES H. SCHMIDT, KRISTOPHER C.  
GOAD, GREYSON GOODENOW AKA  
VANNA GOODENOW, JIMMIE LEE  
JARVIS, ALICE MINIUM, AND THERESSA  
N. WELLER AKA EILIS WELLER,  
ANDREW RINGLE, EDUARDO ACEVEDO,

Plaintiffs,

v.

Case No. 3:22-cv-404

CITY OF RICHMOND, WILLIAM C.  
SMITH, IN HIS INDIVIDUAL CAPACITY,  
WILLIAM BLACKWELL, IN HIS  
INDIVIDUAL CAPACITY, GERALD M.  
SMITH, IN HIS INDIVIDUAL CAPACITY,  
JOHN BRIDGES, IN HIS INDIVIDUAL  
CAPACITY, THOMAS W. LLOYD, IN HIS  
INDIVIDUAL CAPACITY, JAKOB A.  
TORRES, IN HIS INDIVIDUAL CAPACITY,  
BRENDA RUIZ-OYLER, IN HER  
INDIVIDUAL CAPACITY, BENJAMIN J.  
FRAZER, IN HIS INDIVIDUAL CAPACITY,  
APRIL M. DIXON, IN HER INDIVIDUAL  
CAPACITY, PATRICK DIGIROLAMO, IN  
HIS INDIVIDUAL CAPACITY, PAUL D.  
CAMPBELL, IN HIS INDIVIDUAL  
CAPACITY, JUNIUS THORPE, IN HIS  
INDIVIDUAL CAPACITY, NICO YOUNG,  
IN HIS INDIVIDUAL CAPACITY, JOHN  
BEASLEY, IN HIS INDIVIDUAL  
CAPACITY, CHRISTOPHER GLEASON, IN  
HIS INDIVIDUAL CAPACITY, FRANK  
SCARPA, IN HIS INDIVIDUAL CAPACITY,  
KATE LEONE, IN HER INDIVIDUAL  
CAPACITY, DUANE PEPPEL, IN HIS  
INDIVIDUAL CAPACITY, KHALID  
HARRIS, IN HIS INDIVIDUAL CAPACITY,  
BEN MALONE, IN HIS INDIVIDUAL  
CAPACITY, TYLER CRAIG, IN HIS  
INDIVIDUAL CAPACITY, KEEGAN  
MILLS, IN HIS INDIVIDUAL CAPACITY,

DARIO BURALIEV, IN HIS INDIVIDUAL CAPACITY, BENJAMIN O'ROURKE, IN HIS INDIVIDUAL CAPACITY, DOMINIC COLOMBO, IN HIS INDIVIDUAL CAPACITY, DAN BONDY, IN HIS INDIVIDUAL CAPACITY, JASON KUTI, IN HIS INDIVIDUAL CAPACITY, STEVE RAWLINGS, IN HIS INDIVIDUAL CAPACITY, OFFICER DOES 1-50, IN THEIR INDIVIDUAL CAPACITIES,

Defendants.

**JOINT MOTION TO SEVER**

COME NOW Defendants City of Richmond, William C. Smith, William Blackwell, Gerald M. Smith, John Bridges, Thomas W. Lloyd, Jakob A. Torres, Brenda Ruiz-Oyler, Benjamin J. Frazer, April M. Dixon, Patrick Digirolamo, Paul D. Campbell, Junius Thorpe, Nico Young, John Beasley, Christopher Gleason, Frank Scarpa, Kate Leone, Duane Peppel, Khalid Harris, Ben Malone, Tyler Craig, Keegan Mills, Dario Buraliev, Dominic Colombo, Dan Bondy, Jason Kuti, and Steve Rawlings (collectively, "Defendants"), pursuant to Rules 20 and 21 of the Federal Rules of Civil Procedure and hereby jointly move to sever the claims of each Plaintiff for each incident. The bases for seeking the relief requested in this Motion are set forth in the accompanying Brief in Support of Joint Motion to Sever, which is incorporated herein by reference.

**CITY OF RICHMOND, WILLIAM C. SMITH, IN HIS INDIVIDUAL CAPACITY, GERALD M. SMITH, IN HIS INDIVIDUAL CAPACITY, JOHN BRIDGES, IN HIS INDIVIDUAL CAPACITY, THOMAS W. LLOYD, IN HIS INDIVIDUAL CAPACITY, JAKOB A. TORRES, IN HIS INDIVIDUAL CAPACITY, BRENDA RUIZ-OYLER, IN HER INDIVIDUAL CAPACITY, BENJAMIN J. FRAZER, IN HIS INDIVIDUAL CAPACITY, APRIL M. DIXON, IN HER INDIVIDUAL CAPACITY, PATRICK DIGIROLAMO, IN HIS INDIVIDUAL CAPACITY, PAUL D. CAMPBELL, IN HIS INDIVIDUAL CAPACITY, JUNIUS THORPE, IN HIS INDIVIDUAL CAPACITY, NICO YOUNG, IN HIS INDIVIDUAL CAPACITY, JOHN BEASLEY, IN HIS INDIVIDUAL CAPACITY, CHRISTOPHER GLEASON, IN HIS INDIVIDUAL CAPACITY, FRANK SCARPA, IN HIS INDIVIDUAL CAPACITY, KATE LEONE, IN HER INDIVIDUAL CAPACITY, DUANE PEPPEL, IN HIS INDIVIDUAL CAPACITY, KHALID HARRIS, IN HIS INDIVIDUAL CAPACITY, BEN MALONE, IN HIS INDIVIDUAL CAPACITY, TYLER CRAIG, IN HIS INDIVIDUAL CAPACITY, KEEGAN MILLS, IN HIS INDIVIDUAL CAPACITY, DARIO BURALIEV, IN HIS INDIVIDUAL CAPACITY, DOMINIC COLOMBO, IN HIS INDIVIDUAL CAPACITY, DAN BONDY, IN HIS INDIVIDUAL CAPACITY, JASON KUTI, IN HIS INDIVIDUAL CAPACITY, STEVE RAWLINGS, IN HIS INDIVIDUAL CAPACITY, OFFICER DOES 1-50, IN THEIR INDIVIDUAL CAPACITIES**

By Counsel

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**CERTIFICATE OF SERVICE**

I hereby certify that, on this 8<sup>th</sup> day of August, 2022, a true and accurate copy of the foregoing was filed with the Clerk using the CM/ECF system, which will send a notification to all counsel of record.

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